

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**GEORGE FLORES, ET AL.,**

**Plaintiffs,**

**v.**

**ACCC GENERAL AGENCY, INC. D/B/A  
ACCC INSURANCE COMPANY,**

**Defendant.**

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**CIVIL ACTION NO.: 4:21-cv-00027**

**JURY DEMANDED**

**PLAINTIFFS' EXPERT DESIGNATIONS**

Plaintiffs file this Plaintiffs' Expert Witness Designation in the above referenced matter. Since discovery is ongoing, Plaintiffs reserves the right and intends to supplement these designations.

1. Alfonso Kennard, Jr.  
Kennard Law, P.C.  
5120 Woodway Dr., Suite 10010  
Houston, TX 77056  
(713) 742-0900

Mr. Kennard may offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys' fees incurred by Plaintiffs and Plaintiffs' entitlement to these fees under the law. Mr. Kennard may also offer rebuttal testimony to any expert(s) designated by Defendant concerning attorneys' fees. Generally, this expert will testify that because of Defendant's actions, Plaintiffs were required to retain legal counsel and has incurred, and continues to incur fees, and are entitled under the law to recovery of the reasonable and necessary expenses and fees for the services of their legal counsel.

Mr. Kennard's findings, conclusions, opinions, and testimony will be based upon his background, knowledge, experience, and the time expended on the case, the novelty and difficulty

*Plaintiffs' Expert Designations*

of the questions involved in the case, and any other relevant factors as defined by law. Mr. Kennard may also base his opinion on all available billing information, as well as the pleadings, discovery and other documents on file or produced in the case. For information concerning Mr. Kennard's qualifications, please see his biography at [www.kennardlaw.com](http://www.kennardlaw.com). Time spent testifying will be paid at the hourly rate set by the Court.

#### GENERAL PROVISIONS

Plaintiffs reserve the right to amend and/or supplement this designation with additional designations of experts, if necessary, within the time limits imposed by the Court or any alterations of same by subsequent Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or Rules of Evidence.

Plaintiffs reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at the trial of this matter, and to designate again same as a consulting expert, who cannot be called by opposing counsel. Plaintiffs may elicit expert testimony from any and all experts or representatives who have been, or may be, designated by or called by Defendants and who the Court allows to testify. This is not a designation of any expert identified by the Defendants who is de-designated or otherwise not permitted to testify.

Plaintiffs may call to testify as expert witnesses any and all parties to this lawsuit, or employees, agents, or representatives of such parties. This specifically includes, but is not limited to, all personnel of all the parties, and others who have given or may give depositions or who have been identified in the discovery or documents produced or to be produced in this litigation. In addition, any fact witnesses designated by Defendants may offer expert opinions regarding matters within their knowledge. Plaintiffs reserve the right to call undesignated rebuttal experts whose testimony cannot reasonably be foreseen until the presentation of the evidence.

This designation shall serve to supplement Plaintiffs' initial disclosures or any other applicable discovery requests. For each person or entity designated herein, Plaintiffs also designates the custodian of records to the extent necessary to make this designation complete.

Plaintiffs reserves whatever additional rights they may have with regard to experts, pursuant to the Federal Rules of Civil Procedure and Rules of Evidence, the case law construing same, and rulings of the Court.

Respectfully submitted,



A handwritten signature in black ink, appearing to read 'A. Kennard, Jr.', is positioned above a horizontal line.

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**ATTORNEY-IN-CHARGE FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of September 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

A handwritten signature in black ink, appearing to read 'A. Kennard, Jr.', is positioned above a horizontal line.

Alfonso Kennard, Jr.